

1:AR-19-2007 MON 10:50 AM US ATTORNEYS CHARLESTON

FAX NO. 4

P. 02/04

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IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

2007 MAY 11 P 1:57

UNITED STATES OF AMERICA)

vs.)

SARAH'S, LLC)

Criminal No:

PLEA AGREEMENT

General Provisions

This PLEA AGREEMENT is made this 3rd day of May, 2007,
between the United States of America, as represented by United States Attorney REGINALD I.
LLOYD, Assistant United States Attorney Rhett DeHart; the Defendant, SARAH'S, LLC, and
Defendant's Attorney, David Popowski, Esquire.

IN CONSIDERATION of the mutual promises made herein, the parties hereto agree as
follows:

1. The Defendant, SARAH'S, LLC, agrees to waive Indictment and arraignment, and plead guilty to an Information charging trafficking in counterfeit goods, in violation of Title 18, United States Code, Section 2320. In order to sustain its burden of proof as to this offense, the Government is required to prove the following: From in or about April 2005 through April 2006, in the District of South Carolina, the Defendant
 - (A) intentionally trafficked and attempted to traffic;
 - (B) in counterfeit goods; and
 - (C) knowingly used counterfeit marks on and in connection with such goods.

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The maximum penalty for this offense is a \$5,000,000 fine and a \$100 special assessment.

2. The Attorneys for the Government agree not to prosecute the Defendant for other offenses committed in the District of South Carolina prior to the date of this agreement, which are the same or similar character as those cited herein. The Attorneys for the Government further agree not to prosecute any officers, agents, or employees of the Defendant for any offense which is the same or similar to those which gave rise to the Information.
3. The Defendant agrees to pay a special assessment of \$100.00 for each felony count for which it is convicted pursuant to 18 U.S.C. §3013. This special assessment must be paid at or before the time of the guilty plea hearing.
4. The parties stipulate and agree that the Defendant will forfeit to the Immigration and Customs Enforcement a 2003 Chevrolet Astro Van VIN number 1GNDM19X13B140070 as a criminal fine.
5. The parties further stipulate and agree that this Plea Agreement is filed pursuant to FED. R. CRIM. P. 11(c)(1)(C) and if such plea is accepted by the Court, the disposition agreed to herein is binding on the Court.
6. The parties hereby agree that this Plea Agreement contains the entire agreement of the parties; that this Agreement supersedes all prior promises, representations and statements of the parties; that this Agreement shall not be binding on any party until the Defendant tenders a plea of guilty to the court having jurisdiction over this matter; that this

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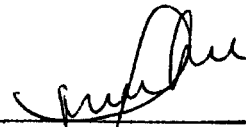
Agreement may be modified only in writing signed by all parties; and that any and all other promises, representations and statements, whether made prior to, contemporaneous with or after this Agreement, are null and void.

5-3-07

DATE

5-3-07

DATE


SARAH'S, LLC, Defendant

Eun Hee Hudson


David Popowski

Attorney for the Defendant

REGINALD I. LLOYD

UNITED STATES ATTORNEY

3-18-07

DATE

BY:


Rhett DeHart

Assistant U. S. Attorney